

REMARKS

In the final Office Action, the Examiner rejects claims 25-46 under 35 U.S.C. § 103(a) as allegedly unpatentable over SHANKER et al. (U.S. Patent No. 6,570,869) in view of PURCELL et al. (U.S. Patent No. 6,094,578). Applicants previously canceled claims 28, 33, 27, and 41, without prejudice or disclaimer of the subject thereof. Applicants respectfully traverse this rejection of pending claims 25-27, 29-32, 34-36, 38-40, and 42-46.¹

The three basic criteria for establishing a *prima facie* case of obviousness are articulated in M.P.E.P. § 2142. First, there must be some suggestion or motivation, either in the reference(s) themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim features. SHANKAR et al. and PURCELL et al. do not teach or suggest features recited in claims 25-27, 29-32, 34-36, 38-40, and 42-46.

For example, independent claim 25 is directed to a method for establishing a telephone call. The method includes receiving a call establishment request, mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, and establishing the

¹ As Applicants' remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such assertions/requirements in the future.

telephone call based on the mapping. SHANKAR et al. and PURCELL et al. do not disclose or suggest this combination of features.

For example, SHANKAR et al. and PURCELL et al. do not disclose or suggest mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format. The Examiner relies on col. 1, lines 30-37, col. 2, lines 44-67, and col. 5, lines 15-32, of SHANKAR et al. for allegedly disclosing converting to a session initiation protocol and on col. 3, lines 5-14, col. 4, lines 50-57, col. 7, line 37 to col. 8, line 37, the Abstract, and Figs. 6a-6c of PURCELL et al. for allegedly disclosing mapping a nature of address indicator from a first format to a second format (final Office Action, pp. 2-4). Applicants continue to strenuously object to the Examiner's piecemeal examination of the above feature of claim 25.

That is, instead of addressing the feature of mapping a nature of address indicator from a first format to the session initiation protocol or from the session initiation protocol format to the first format, the Examiner breaks the feature down into illogical parts by pointing to one reference for allegedly disclosing mapping a nature of address indicator from a first format to a second format and to a second reference for allegedly disclosing the session initiation protocol. Such attempts at reconstructing Applicants' claims are clearly impermissible. Moreover, the Examiner does not explain why one skilled in the art at the time of Applicants' invention would seek to modify SHANKER et al. or PURCELL et al. to include mapping a nature of address indicator from a first format to the session initiation protocol or from the first format to the session initiation protocol.

Applicants submit that while SHANKAR et al. may disclose the session initiation protocol, SHANKAR et al. in no way discloses or suggests mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25. The Examiner cannot reasonably rely on SHANKAR et al. for disclosing this feature of claim 25 since the Examiner admits that SHANKAR et al. does not disclose mapping a nature of address indicator from a first format to a second format (final Office Action, pg. 3).

Nonetheless, at col. 1, lines 25-37, SHANKAR et al. discloses:

Over the decades, however, major voice carriers have invested heavily in developing a Signaling System 7 (SS7) signaling and switching infrastructure to offer reliable telephone service. This infrastructure includes countless systems for billing, provisioning, maintenance, and databases that are compatible only with SS7. These systems are commonly referred to "legacy systems," a term that also includes other proprietary protocols such as ISDN_PRI, DPNSS, ISUP, TUP, NUP, H.323, and SIP. Due to the substantial investment in the legacy systems, it is desirable to keep the legacy systems in operation, yet still take advantage of the newer packet technologies.

This section of SHANKAR et al. discloses that the term "legacy systems" includes the session initiation protocol (SIP). This section of SHANKAR et al. in no way discloses or suggests mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25. In fact, this section of SHANKAR et al. in no way relates to mapping.

At col. 2, lines 44-67, SHANKAR et al. discloses:

More specifically, mechanisms are provided for handing the Layer 3 voice signaling of a voice call by a signaling apparatus and the Layer 2 voice traffic of the voice call by coding units. The signaling apparatus

implements signaling interworking and protocol conversion, if necessary, between the legacy systems and the packet-switching network. The coding units convert bearer voice traffic between legacy and packet formats and, in some configurations, groom and backhaul the signaling information for the voice to the signaling apparatus. By separating the processing for voice signaling from handling the voice data, a flexible solution for integrating with legacy systems is attained.

One aspect of the invention involves a telecommunications network that includes a packet-switching network, such as an IP, ATM, or frame relay network, at least two coding units coupled to the packet-switching network and to an originating node and a terminating node, respectively, and a signaling apparatus coupled to the coding units. The first of the two coding units is configured, among other things, to transmit its network address to the signaling apparatus and, in one embodiment, signaling data associated with the voice call. The second coding unit is controllable to establish a bearer channel with the first coding unit through the packet-switching network for the voice call.

This section of SHANKAR et al. discloses a signaling apparatus that implements protocol conversion between the legacy systems and the packet-switching network. This section of SHANKAR et al. further discloses a coding unit that converts bearer voice traffic between legacy and packet formats. This section of SHANKAR et al. in no way discloses or suggests mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25.

At col. 5, lines 15-32, SHANKAR et al. discloses:

The originating signaling unit 120 and the terminating signaling unit 140 implement a "virtual switch" and are responsible for processing and routing the signaling messages that are exchanged to set up and tear down a voice connection. Thus, the signaling units perform such functions as call resolution, call routing, bearer selection, and generation of call detail records (CDRs) for billing management. In one embodiment, the signaling units also convert the legacy protocols of the originating node 100 and the terminating node 160, such as DPNSS, ISDN_PRI, SS7/C7 (including ISUPs, TUPs, and NUPs), H.323, SIP, or CAS, into messages for

communicating with one another and for controlling a coding unit over control links 114 and 154. Control links 114 and 154 can be implemented over IP or ATM and, in fact, on the same channel as the respective backhaul signaling link 112 and 152, respectively. Through the control link, a coding unit is controlled by a signaling unit, for example, to establish a bearer channel for the voice data over the packet-switching network 130.

This section of SHANKAR et al. discloses that a signaling unit converts legacy protocols, such as SIP, of originating node 100 and terminating node 160 into messages for communicating with one another and for controlling a coding unit over control lines 114 and 154. This section of SHANKAR et al. in no way discloses or suggests that the conversion of legacy protocols includes mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25.

With respect to PURCELL et al., Applicants note that PURCELL et al. does not disclose or suggest a session initiation protocol format. Therefore, the Examiner cannot reasonably rely on PURCELL et al. for disclosing mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25.

Nonetheless, at col. 3, lines 5-14, PURCELL et al. discloses:

It is an object of the present invention to convert signals in a format associated with a first international communications network into a different format required by a second international communications network. It is an object of the present invention to process the translation of a subscriber's global title address from the type of global title addressing used by a first communications network into the type required by the second communications network.

This section of PURCELL et al. discloses the conversion of signals in a format associated with a first international communications network into a different format required by a second international communications network. This section of PURCELL et al. does not disclose or suggest mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25.

At col. 4, lines 50-57, PURCELL et al. discloses:

Preferably, the necessary protocol conversions are accomplished through the use of look-up tables or conversion tables. The conversion tables contain the necessary information for translating messages from the North American message format into the foreign message format, and visa versa. Alternatively, protocol conversion could also be implemented through the use of neural networks or digital signal processing elements.

This section of PURCELL et al. discloses the use of conversion tables for translating messages from the North American message format into a foreign message format. This section of PURCELL et al. does not disclose or suggest mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25.

At col. 7, line 37 to col. 8, line 37, PURCELL et al. discloses mapping tables that can be used in translating ANSI Signaling Connection Control Part (SCCP) global title formats and values into the ITU SCCP global title formats and values. This section of PURCELL et al. does not disclose or suggest mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25.

In the Abstract, PURCELL et al. discloses:

A gateway unit which acts to provide interoperability between disparate mobile communications networks. The gateway unit provides the necessary protocol conversions between the different mobile networks. The gateway unit can be a stand-alone unit or co-located with a mobile switching center (MSC) within North America or in foreign country. In each case, the gateway unit serves as an interconnection point between two or more networks. For example, the gateway unit converts messages from European networks, which use the International Telecommunications Union (ITU) and mobile global title (MGT) protocols to North American networks, which use the American National Standards Institute (ANSI) and international mobile station identity address (IMSI) protocols, and vice versa. The gateway unit preferably includes the elements of a processor, software and memory, all of which could be provided on a circuit board or in a conventional personal computer. Preferably, the conversions are performed through the use of a series of look-up tables, stored in the memory. Once the incoming messages, from a first communications network, have been converted, subsequently, they are forwarded to their destination in the second communications network.

This section of PURCELL et al. discloses protocol conversion between different mobile networks. This section of PURCELL et al. does not disclose or suggest mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25.

Figs. 6a-6c of PURCELL et al. depict mapping tables used in the translation of ANSI SCCP global title formats and values into ITU SCCP global title formats and values. These figures (and their corresponding description) specifically disclose that the translation of an ANSI SS7 protocol to an ITU SS7 protocol is based on a translation type value. For example, at col. 8, lines 4-9, PURCELL et al. specifically discloses, with reference to Fig. 6a:

The gateway unit 90 performs this translation by equating the Translation Type=9 (123) to the Numbering Plan=ITU E.212 (125), Encoding Scheme=BCD Odd/Even 127, and Nature of Address Indicator=International 129, used in the ITU SS7 protocol.

(Emphasis added). Therefore, in stark contrast to the above feature of claim 25, PURCELL et al. discloses the mapping of a translation type value to numbering plan, encoding scheme, and nature of address indicator values of a different protocol. PURCELL et al. does not disclose or suggest mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25. In fact, as indicated above, PURCELL et al. does not even mention the session initiation protocol.

With respect to the above arguments, the Examiner alleges that Figs. 6a-6c of PURCELL et al. show examples of mapping tables used in the translation process between ANSI and ITU formats and points to col. 7, line 37 to col. 8, line 37 (discussed above) of PURCELL et al. for support (final Office Action, pg. 7). Regardless of the veracity of the Examiner's allegation, PURCELL et al. does not disclose or suggest mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25.

Further in response to the above arguments, the Examiner provides definitions of "nature of address" and "numbering plan indicator" and the Examiner's impressions of how telecommunication switches typically work (final Office Action, pg. 7).

Contrary to the Examiner's definition, a numbering plan indicator, as the name suggests, is a value that identifies a numbering plan for a call. For example, a numbering plan indicator value of "1" indicates an ISDN telephony call, according to the E.164 numbering plan.

Moreover, Applicants submit that the Examiner's characterization of the operations of telecommunication switches (regardless of its veracity) does not remedy the fact that neither SHANKAR et al. nor PURCELL et al. discloses or suggests mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 25. As indicated above, Applicant submits that the Examiner's piecemeal examination of this feature (by pointing to SHANKAR et al. for disclosing the session initiation protocol and PURCELL et al. for disclosing translation of ANSI SCCP global title formats and values into ITU SCCP global title formats and values) is impermissible.

Since SHANKAR et al. and PURCELL et al. do not disclose or suggest mapping a nature of address indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, SHANKAR et al. and PURCELL et al. cannot disclose or suggest establishing a telephone call based on the mapping, as also recited in claim 25.

SHANKAR et al. and PURCELL et al. do not disclose or suggest the combination of features recited in claim 25. Therefore, a *prima facie* case of obviousness has not been established with respect to claim 25.

Applicants further submit that one skilled in the art at the time of Applicants' invention would not have been motivated to incorporate PURCELL et al.'s alleged nature of address conversion into the SHANKAR et al. system, absent impermissible hindsight. With respect to motivation, the Examiner alleges:

it would have been obvious ... to incorporate both an NOA and NPI within Shanker so as to allow for continuous and smooth interconnect of communications path between different network interfaces

(final Office Action, pp. 4 and 8). Applicants submit that the Examiner's allegation is merely a conclusory statement regarding an alleged benefit of the combination. Such motivation statements are insufficient for establishing a *prima facie* case of obviousness. Applicants submit that the Examiner's motivation is based on impermissible hindsight.

Moreover, the Examiner believes it is reasonable to conclude that incorporating a nature of address indicator and a numbering plan indicator into the SHANKAR et al. system would "allow for continuous and smooth interconnect of communications path between different network interfaces." Thus, by incorporating these two indicators into the SHANKAR et al. system, the Examiner believes that it is reasonable to conclude that the SHANKAR et al. system would somehow be capable of a continuous and smooth interconnect of a communications path between different network interfaces. Applicants submit that this allegation is far-fetched at best and not supported by any facts. Clearly, the Examiner's motivation for combining pieces of two different documents to reconstruct the above feature of claim 25 is impermissibly based on hindsight.

For at least the foregoing reasons, Applicants submit that claim 25 is patentable over SHANKAR et al. and PURCELL et al., whether taken alone or in any reasonable combination.

Claims 26, 27, and 29 depend from claim 25. Therefore, these claims are patentable over SHANKAR et al. and PURCELL et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 25.

Moreover, these claims recite additional features not disclosed or suggested by SHANKAR et al. and PURCELL et al.

For example, claim 26 recites mapping a numbering plan indicator from the first format to the session initiation protocol format or from the session initiation protocol format to the first format. The Examiner relies on col. 1, lines 30-37, col. 2, lines 44-67, and col. 5, lines 15-32, of SHANKAR et al. for allegedly disclosing converting to a session initiation protocol and on col. 3, lines 5-14, col. 4, lines 50-57, col. 7, line 37 to col. 8, line 37, the Abstract, and Figs. 6a-6c of PURCELL et al. for allegedly disclosing mapping a nature of address indicator from a first format to a second format (final Office Action, pp. 4-6). Applicants strenuously object to the Examiner's piecemeal examination of the above feature of claim 26.

That is, instead of addressing the feature of mapping a numbering plan indicator from a first format to a session initiation protocol or from the session initiation protocol format to the first format, the Examiner breaks the feature down into illogical parts by pointing to one reference for allegedly disclosing mapping a numbering plan indicator from a first format to a second format and to a second reference for allegedly disclosing the session initiation protocol. Such attempts at reconstructing Applicants' claims are clearly impermissible. Moreover, the Examiner does not explain why one skilled in the art at the time of Applicants' invention would seek to modify SHANKER et al. or PURCELL et al. to include mapping a numbering plan indicator from a first format to the session initiation protocol or from the session initiation protocol to the first format.

Applicants note that while SHANKAR et al. may disclose the session initiation protocol, SHANKAR et al. in no way discloses or suggests mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 26. The Examiner cannot reasonably rely on SHANKAR et al. for disclosing this feature of claim 26 since the Examiner admits that SHANKAR et al. does not disclose mapping a numbering plan indicator from a first format to a second format (final Office Action, pg. 5).

Nonetheless, col. 1, lines 25-37 of SHANKAR et al. is reproduced above and discloses that the term "legacy systems" includes SIP. This section of SHANKAR et al. in no way discloses or suggests mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 26. In fact, this section of SHANKAR et al. in no way relates to mapping.

Col. 2, lines 44-67 of SHANKAR et al. is reproduced above and discloses a signaling apparatus that implements protocol conversion between the legacy systems and the packet-switching network. This section of SHANKAR et al. further discloses a coding unit that converts bearer voice traffic between legacy and packet formats. This section of SHANKAR et al. in no way discloses or suggests mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 26.

Col. 5, lines 15-32 of SHANKAR et al. is reproduced above and discloses that a signaling unit converts legacy protocols, such as SIP, of originating node 100 and

terminating node 160 into messages for communicating with one another and for controlling a coding unit over control lines 114 and 154. This section of SHANKAR et al. in no way discloses or suggests that the conversion of legacy protocols includes mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 26.

With respect to PURCELL et al., Applicants note that PURCELL et al. does not disclose or suggest a session initiation protocol format. Therefore, the Examiner cannot reasonably rely on PURCELL et al. for disclosing mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 26.

Nonetheless, col. 3, lines 5-14, of PURCELL et al. is reproduced above and discloses the conversion of signals in a format associated with a first international communications network into a different format required by a second international communications network. This section of PURCELL et al. does not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 26.

Col. 4, lines 50-57, of PURCELL et al. is reproduced above and discloses the use of conversion tables for translating messages from the North American message format into a foreign message format. This section of PURCELL et al. does not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation

protocol format or from the session initiation protocol format to the first format, as recited in claim 26.

At col. 7, line 37 to col. 8, line 37, PURCELL et al. discloses mapping tables that can be used in translating of ANSI Signaling Connection Control Part (SCCP) global title formats and values into the ITU SCCP global title formats and values. This section of PURCELL et al. does not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 26.

The Abstract of PURCELL et al. is reproduced above and discloses protocol conversion between different mobile networks. This section of PURCELL et al. does not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 26.

Figs. 6a-6c of PURCELL et al. depict mapping tables used in the translation of ANSI SCCP global title formats and values into ITU SCCP global title formats and values. These figures (and their corresponding description) specifically disclose that the translation of an ANSI SS7 protocol to an ITU SS7 protocol is based on a translation type value. For example, at col. 8, lines 4-9, PURCELL et al. specifically discloses, with reference to Fig. 6a:

The gateway unit 90 performs this translation by equating the Translation Type=9 (123) to the Numbering Plan=ITU E.212 (125), Encoding Scheme=BCD Odd/Even 127, and Nature of Address Indicator=International 129, used in the ITU SS7 protocol.

(Emphasis added). Therefore, in stark contrast to the above feature of claim 26, PURCELL et al. discloses the mapping of a translation type value to numbering plan, encoding scheme, and nature of address indicator values of a different protocol. PURCELL et al. does not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 26. In fact, as indicated above, PURCELL et al. does not even mention the session initiation protocol.

SHANKAR et al. and PURCELL et al. do not disclose or suggest the combination of features recited in claim 26. Therefore, a *prima facie* case of obviousness has not been established with respect to claim 26.

Applicants further submit that one skilled in the art at the time of Applicants' invention would not have been motivated to incorporate PURCELL et al.'s alleged numbering plan conversion into the SHANKAR et al. system, absent impermissible hindsight. With respect to motivation, the Examiner alleges:

it would have been obvious ... to incorporate both an NOA and NPI within Shanker so as to allow for continuous and smooth interconnect of communications path between different network interfaces

(final Office Action, pg. 6). Applicants submit that the Examiner's allegation is merely a conclusory statement regarding an alleged benefit of the combination. Such motivation statements are insufficient for establishing a *prima facie* case of obviousness. Applicants submit that the Examiner's motivation is based on impermissible hindsight.

Moreover, the Examiner believes it is reasonable to conclude that incorporating a nature of address indicator and a numbering plan indicator into the SHANKAR et al.

system would "allow for continuous and smooth interconnect of communications path between different network interfaces." Thus, by incorporating these two indicators into the SHANKAR et al. system, the Examiner believes that it is reasonable to conclude that the SHANKAR et al. system would somehow be capable of a continuous and smooth interconnect of a communications path between different network interfaces. Applicants submit that this allegation is far-fetched at best. Clearly, the Examiner's motivation for combining pieces of two different documents to reconstruct the above feature of claim 26 is impermissibly based on hindsight.

For at least these additional reasons, Applicants submit that claim 26 is patentable over SHANKAR et al. and PURCELL et al., whether taken alone or in any reasonable combination.

Claim 29 recites that the first format includes one of signaling system 7 (SS7) format, integrated services digital network (ISDN) format, ISDN user part (ISUP) format, or channel associated signaling (CAS) format. The Examiner relies on col. 1, lines 25-37, and col. 4, line 50 to col. 5, line 27, of SHANKAR et al. for allegedly disclosing this feature (final Office Action, pg. 6). At the outset, Applicants note that the Examiner admits that SHANKAR et al. does not disclose mapping a nature of address indicator from a first format to a second format (final Office Action, pg. 3). Therefore, it is unclear how the Examiner can reasonably rely on SHANKAR et al. for disclosing mapping a nature of address indicator from a first format to a session initiation protocol or from the session initiation protocol to the first format, where the first format includes one of SS7 format, ISDN format, ISUP format, or CAS format.

Nonetheless, col. 1, lines 25-37, of SHANKAR et al. is reproduced above and discloses that the term "legacy systems" includes ISDN_PRI, DPNSS, ISUP, TUP, NUP, H.323, and SIP. This section of SHANKAR et al. in no way discloses or suggests mapping a nature of address indicator from a session initiation protocol to a first format or from the session initiation protocol to the first format, where the first format includes one of SS7 format, ISDN format, ISUP format, or CAS format, as recited in claim 29. In fact, this section of SHANKAR et al. in no way relates to mapping.

At col. 4, line 50 to col. 5, line 27, SHANKAR et al. discloses that originating signaling unit 120 and terminating signaling unit 140 convert the legacy protocols, such as DPNSS, ISDN_PRI, SS7/C7 (including ISUPs, TUPs, and NUPs), H.323, SIP, or CAS, of originating node 100 and terminating node 160 into messages for communicating with one another and for controlling a coding unit over control lines 114 and 154. This section of SHANKAR et al. in no way discloses or suggests that the conversion of legacy protocols includes mapping a nature of address indicator from a session initiation protocol to a first format or from the session initiation protocol to the first format, where the first format includes one of SS7 format, ISDN format, ISUP format, or CAS format, as recited in claim 29.

For at least these additional reasons, Applicants submit that claim 29 is patentable over SHANKAR et al. and PURCELL et al., whether taken alone or in any reasonable combination.

Independent claim 30 is directed to a method for establishing a telephone call. The method includes receiving a call establishment request, mapping a numbering plan

indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, and establishing the telephone call based on the mapping. SHANKAR et al. and PURCELL et al. do not disclose or suggest this combination of features.

For example, SHANKAR et al. and PURCELL et al. do not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format. The Examiner appears to rely on SHANKAR et al. for allegedly disclosing the session initiation protocol and on PURCELL et al. for allegedly disclosing mapping a numbering plan indicator from a first format to a second format (final Office Action, pp. 2-4). Applicants strenuously object to the Examiner's piecemeal examination of the above feature of claim 30. That is, instead of addressing the feature of mapping a numbering plan indicator from a session initiation protocol to a first format or from the session initiation protocol to the first format, the Examiner breaks the feature down into illogical parts by pointing to one reference for allegedly disclosing mapping a numbering plan indicator from a first format to a second format and to a second reference for allegedly disclosing the session initiation protocol. Such attempts at reconstructing Applicants' claims are clearly impermissible. Moreover, the Examiner does not explain why one skilled in the art at the time of Applicants' invention would seek to modify SHANKER et al. or PURCELL et al. to include mapping a numbering plan indicator from a first format to a session initiation protocol or from a session initiation protocol to a first format.

Nevertheless, the Examiner relies on col. 1, lines 30-37, col. 2, lines 44-67, and col. 5, lines 15-32, of SHANKAR et al. for allegedly disclosing converting to a session initiation protocol and on col. 3, lines 5-14, col. 4, lines 50-57, col. 7, line 37 to col. 8, line 37, the Abstract, and Figs. 6a-6c of PURCELL et al. for allegedly disclosing mapping a nature of address indicator from a first format to a second format (final Office Action, pp. 4-6). Applicants submit that these sections of SHANKAR et al. and PURCELL et al. do not disclose or suggest the above feature of claim 30.

At the outset, while SHANKAR et al. may disclose the session initiation protocol, Applicants submit that SHANKAR et al. in no way discloses or suggests mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 30. The Examiner cannot reasonably rely on SHANKAR et al. for disclosing this feature of claim 30 since the Examiner admits that SHANKAR et al. does not disclose mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format (final Office Action, pg. 3).

Nonetheless, col. 1, lines 25-37, of SHANKAR et al. is reproduced above and discloses that the term "legacy systems" includes SIP. This section of SHANKAR et al. in no way discloses or suggests mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 30. In fact, this section of SHANKAR et al. in no way relates to mapping.

Col. 2, lines 44-67, of SHANKAR et al. is reproduced above and discloses a signaling apparatus that implements protocol conversion between the legacy systems and the packet-switching network. This section of SHANKAR et al. further discloses a coding unit that converts bearer voice traffic between legacy and packet formats. This section of SHANKAR et al. in no way discloses or suggests mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 30.

Col. 5, lines 15-32, of SHANKAR et al. is reproduced above and discloses that a signaling unit converts legacy protocols, such as SIP, of originating node 100 and terminating node 160 into messages for communicating with one another and for controlling a coding unit over control lines 114 and 154. This section of SHANKAR et al. in no way discloses or suggests that the conversion of legacy protocols includes mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 30.

With respect to PURCELL et al., Applicants note that PURCELL et al. does not disclose or suggest a session initiation protocol format. Therefore, the Examiner cannot reasonably rely on PURCELL et al. for disclosing mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 30.

Col. 3, lines 5-14, of PURCELL et al. is reproduced above and discloses the conversion of signals in a format associated with a first international communications

network into a different format required by a second international communications network. This section of PURCELL et al. does not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 30.

Col. 4, lines 50-57, of PURCELL et al. is reproduced above and discloses the use of conversion tables for translating messages from the North American message format into a foreign message format. This section of PURCELL et al. does not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 30.

At col. 7, line 37 to col. 8, line 37, PURCELL et al. discloses mapping tables that can be used in translating of ANSI Signaling Connection Control Part (SCCP) global title formats and values into the ITU SCCP global title formats and values. This section of PURCELL et al. does not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 30.

The Abstract of PURCELL et al. is reproduced above and discloses protocol conversion between different mobile networks. This section of PURCELL et al. does not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 30.

Figs. 6a-6c of PURCELL et al. depict mapping tables used in the translation of ANSI SCCP global title formats and values into ITU SCCP global title formats and values. These figures (and their corresponding description) specifically disclose that the translation of an ANSI SS7 protocol to an ITU SS7 protocol is based on a translation type value. For example, at col. 8, lines 4-9, PURCELL et al. specifically discloses, with reference to Fig. 6a:

The gateway unit 90 performs this translation by equating the Translation Type=9 (123) to the Numbering Plan=ITU E.212 (125), Encoding Scheme=BCD Odd/Even 127, and Nature of Address Indicator=International 129, used in the ITU SS7 protocol.

(Emphasis added). Therefore, in stark contrast to the above feature of claim 30, PURCELL et al. discloses the mapping of a translation type value to numbering plan, encoding scheme, and nature of address indicator values of a different protocol. PURCELL et al. does not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, as recited in claim 30. In fact, as indicated above, PURCELL et al. does not even mention the session initiation protocol.

Since SHANKAR et al. and PURCELL et al. do not disclose or suggest mapping a numbering plan indicator from a first format to a session initiation protocol format or from the session initiation protocol format to the first format, SHANKAR et al. and PURCELL et al. cannot disclose or suggest establishing a telephone call based on the mapping, as also recited in claim 30.

SHANKAR et al. and PURCELL et al. do not disclose or suggest the combination of features recited in claim 30. Therefore, a *prima facie* case of obviousness has not been established with respect to claim 30.

Applicants further submit that one skilled in the art at the time of Applicants' invention would not have been motivated to incorporate PURCELL et al.'s alleged numbering plan conversion into the SHANKAR et al. system, absent impermissible hindsight. With respect to motivation, the Examiner alleges:

it would have been obvious ... to incorporate both an NOA and NPI within Shanker so as to allow for continuous and smooth interconnect of communications path between different network interfaces
(final Office Action, pg. 4). Applicants submit that the Examiner's allegation is merely a conclusory statement regarding an alleged benefit of the combination. Such motivation statements are insufficient for establishing a *prima facie* case of obviousness. Applicants submit that the Examiner's motivation is based on impermissible hindsight.

Moreover, the Examiner believes it is reasonable to conclude that incorporating a nature of address indicator and a numbering plan indicator into the SHANKAR et al. system would "allow for continuous and smooth interconnect of communications path between different network interfaces." Thus, by incorporating these two indicators into the SHANKAR et al. system, the Examiner believes that it is reasonable to conclude that the SHANKAR et al. system would somehow be capable of a continuous and smooth interconnect of a communications path between different network interfaces. Applicants submit that this allegation is far-fetched at best and not supported by any facts. Clearly,

the Examiner's motivation for combining pieces of two different documents to reconstruct the above feature of claim 25 is impermissibly based on hindsight.

For at least the foregoing reasons, Applicants submit that claim 30 is patentable over SHANKAR et al. and PURCELL et al., whether taken alone or in any reasonable combination.

Claims 31, 32, and 34 depend from claim 30. Therefore, these claims are patentable over SHANKAR et al. and PURCELL et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 30. Moreover, these claims recite additional features not disclosed or suggested by SHANKAR et al. and PURCELL et al.

For example, claims 31, 32, and 34 recite features similar to (yet possibly of different scope than) features described above with respect to claims 25-27 and 29. Therefore, these claims are patentable over SHANKAR et al. and PURCELL et al., whether taken alone or in any reasonable combination, for at least reasons similar to reasons given above with respect to claims 25-27 and 29.

Independent claims 35, 39, 43, and 44 recite features similar to (yet possibly of different scope than) features described above with respect to claims 25 and 30. Therefore, these claims are patentable over SHANKAR et al. and PURCELL et al., whether taken alone or in any reasonable combination, for at least reasons similar to reasons given above with respect to claims 25 and 30.

Claims 36 and 38 depend from claim 35. Therefore, these claims are patentable over SHANKAR et al. and PURCELL et al., whether taken alone or in any reasonable

combination, for at least the reasons given above with respect to claim 35. Moreover, these claims recite features similar to (yet possibly of different scope than) features described above with respect to claims 26 and 29. Therefore, these claims are also patentable over SHANKAR et al. and PURCELL et al. for at least reasons similar to reasons given above with respect to claims 26 and 29.

Claims 40 and 42 depend from claim 39. Therefore, these claims are patentable over SHANKAR et al. and PURCELL et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 39. Moreover, these claims recite features similar to (yet possibly of different scope than) features described above with respect to claims 26 and 29. Therefore, these claims are also patentable over SHANKAR et al. and PURCELL et al. for at least reasons similar to reasons given above with respect to claims 26 and 29.

Claims 45 and 46 depend from claim 44. Therefore, these claims are patentable over SHANKAR et al. and PURCELL et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 44. Moreover, these claims recite features similar to (yet possibly of different scope than) features described above with respect to claims 26 and 29. Therefore, these claims are also patentable over SHANKAR et al. and PURCELL et al. for at least reasons similar to reasons given above with respect to claims 26 and 29.

In view of the foregoing remarks, Applicants respectfully request the Examiner's reconsideration of this application, and the timely allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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